

**Executive Summary - Enforcement Matter - Case No. 64216**

**City of Savoy**

**RN102921988**

**Docket No. 2023-0813-MWD-E**

**Order Type:**

Findings Agreed Order

**Findings Order Justification:**

People or environmental receptors have been exposed to pollutants which exceed levels that are protective.

**Media:**

MWD

**Small Business:**

No

**Location(s) Where Violation(s) Occurred:**

Savoy WWTP, 601 North Cedar Street, Savoy, Fannin County

**Type of Operation:**

Wastewater treatment facility

**Other Significant Matters:**

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Past-Due Fees: No

Other: N/A

Interested Third-Parties: None

**Texas Register Publication Date:** October 3, 2025

**Comments Received:** No

***Penalty Information***

**Total Penalty Assessed:** \$23,000

**Total Paid to General Revenue:** \$23,000

**Total Due to General Revenue:** \$0

Payment Plan: N/A

**Compliance History Classifications:**

Person/CN - Satisfactory

Site/RN - Satisfactory

**Major Source:** No

**Statutory Limit Adjustment:** N/A

**Applicable Penalty Policy:** January 2021

***Investigation Information***

**Complaint Date(s):** N/A

**Complaint Information:** N/A

**Date(s) of Investigation:** April 27, 2023

**Date(s) of NOE(s):** June 1, 2023

**Executive Summary – Enforcement Matter – Case No. 64216**

**City of Savoy**

**RN102921988**

**Docket No. 2023-0813-MWD-E**

***Violation Information***

Failed to comply with permitted effluent limitations for ammonia nitrogen, total suspended solids, and carbonaceous biochemical oxygen demand (5-day) [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0014273001, Effluent Limitations and Monitoring Requirements No. 1].

***Corrective Actions/Technical Requirements***

**Corrective Action(s) Completed:**

N/A

**Technical Requirements:**

The Order will require the Respondent to, within 130 days, submit written certification of compliance with the effluent limitations of TPDES Permit No. WQ0014273001, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations.

***Contact Information***

**TCEQ Attorney:** N/A

**TCEQ Enforcement Coordinator:** Kolby Farren, Enforcement Division, Enforcement Team 7, MC R-12, (512) 239-2098; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548

**Respondent:** The Honorable Joe Petree, Mayor, City of Savoy, P.O. Box 176, Savoy, Texas 75479

**Respondent's Attorney:** N/A



# Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

|              |                 |             |                  |             |                |  |
|--------------|-----------------|-------------|------------------|-------------|----------------|--|
| <b>DATES</b> | <b>Assigned</b> | 12-Jun-2023 | <b>Screening</b> | 22-Jun-2023 | <b>EPA Due</b> |  |
|              | <b>PCW</b>      | 24-Jul-2025 |                  |             |                |  |

## RESPONDENT/FACILITY INFORMATION

|                             |                     |
|-----------------------------|---------------------|
| <b>Respondent</b>           | City of Savoy       |
| <b>Reg. Ent. Ref. No.</b>   | RN102921988         |
| <b>Facility/Site Region</b> | 4-Dallas/Fort Worth |
| <b>Major/Minor Source</b>   | Minor               |

## CASE INFORMATION

|                                        |                 |                              |                    |
|----------------------------------------|-----------------|------------------------------|--------------------|
| <b>Enf./Case ID No.</b>                | 64216           | <b>No. of Violations</b>     | 2                  |
| <b>Docket No.</b>                      | 2023-0813-MWD-E | <b>Order Type</b>            | Findings           |
| <b>Media Program(s)</b>                | Water Quality   | <b>Government/Non-Profit</b> | Yes                |
| <b>Multi-Media</b>                     |                 | <b>Enf. Coordinator</b>      | Kolby Farren       |
|                                        |                 | <b>EC's Team</b>             | Enforcement Team 7 |
| <b>Admin. Penalty \$ Limit Minimum</b> | \$0             | <b>Maximum</b>               | \$25,000           |

## Penalty Calculation Section

|                                                             |                   |          |
|-------------------------------------------------------------|-------------------|----------|
| <b>TOTAL BASE PENALTY (Sum of violation base penalties)</b> | <b>Subtotal 1</b> | \$20,000 |
|-------------------------------------------------------------|-------------------|----------|

## ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

|                           |       |                   |                                |         |
|---------------------------|-------|-------------------|--------------------------------|---------|
| <b>Compliance History</b> | 15.0% | <b>Adjustment</b> | <b>Subtotals 2, 3, &amp; 7</b> | \$3,000 |
|---------------------------|-------|-------------------|--------------------------------|---------|

|              |                                                                   |
|--------------|-------------------------------------------------------------------|
| <b>Notes</b> | Enhancement for three months of self-reported effluent violations |
|--------------|-------------------------------------------------------------------|

|                    |    |      |                    |                   |     |
|--------------------|----|------|--------------------|-------------------|-----|
| <b>Culpability</b> | No | 0.0% | <b>Enhancement</b> | <b>Subtotal 4</b> | \$0 |
|--------------------|----|------|--------------------|-------------------|-----|

|              |                                                        |
|--------------|--------------------------------------------------------|
| <b>Notes</b> | The Respondent does not meet the culpability criteria. |
|--------------|--------------------------------------------------------|

|                                                      |                   |     |
|------------------------------------------------------|-------------------|-----|
| <b>Good Faith Effort to Comply Total Adjustments</b> | <b>Subtotal 5</b> | \$0 |
|------------------------------------------------------|-------------------|-----|

|                         |      |                     |                   |     |
|-------------------------|------|---------------------|-------------------|-----|
| <b>Economic Benefit</b> | 0.0% | <b>Enhancement*</b> | <b>Subtotal 6</b> | \$0 |
|-------------------------|------|---------------------|-------------------|-----|

|                              |         |                                   |
|------------------------------|---------|-----------------------------------|
| Total EB Amounts             | \$816   | *Capped at the Total EB \$ Amount |
| Estimated Cost of Compliance | \$5,000 |                                   |

|                             |                       |          |
|-----------------------------|-----------------------|----------|
| <b>SUM OF SUBTOTALS 1-7</b> | <b>Final Subtotal</b> | \$23,000 |
|-----------------------------|-----------------------|----------|

|                                             |      |                   |     |
|---------------------------------------------|------|-------------------|-----|
| <b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b> | 0.0% | <b>Adjustment</b> | \$0 |
|---------------------------------------------|------|-------------------|-----|

Reduces or enhances the Final Subtotal by the indicated percentage.

|                             |          |
|-----------------------------|----------|
| <b>Notes</b>                |          |
| <b>Final Penalty Amount</b> | \$23,000 |

|                                   |                               |          |
|-----------------------------------|-------------------------------|----------|
| <b>STATUTORY LIMIT ADJUSTMENT</b> | <b>Final Assessed Penalty</b> | \$23,000 |
|-----------------------------------|-------------------------------|----------|

|                 |      |                  |                   |     |
|-----------------|------|------------------|-------------------|-----|
| <b>DEFERRAL</b> | 0.0% | <b>Reduction</b> | <b>Adjustment</b> | \$0 |
|-----------------|------|------------------|-------------------|-----|

Reduces the Final Assessed Penalty by the indicated percentage.

|              |                                                 |
|--------------|-------------------------------------------------|
| <b>Notes</b> | No deferral is recommended for Findings Orders. |
|--------------|-------------------------------------------------|

|                        |          |
|------------------------|----------|
| <b>PAYABLE PENALTY</b> | \$23,000 |
|------------------------|----------|

|                                |               |                   |                 |            |
|--------------------------------|---------------|-------------------|-----------------|------------|
| <b>Screening Date</b>          | 22-Jun-2023   | <b>Docket No.</b> | 2023-0813-MWD-E | <b>PCW</b> |
| <b>Respondent</b>              | City of Savoy |                   |                 |            |
| <b>Case ID No.</b>             | 64216         |                   |                 |            |
| <b>Reg. Ent. Reference No.</b> | RN102921988   |                   |                 |            |
| <b>Media</b>                   | Water Quality |                   |                 |            |
| <b>Enf. Coordinator</b>        | Kolby Farren  |                   |                 |            |

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

## Compliance History Worksheet

### >> Compliance History Site Enhancement (Subtotal 2)

| Component                     | Number of...                                                                                                                                                                                                                           | Number | Adjust. |
|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------|
| NOVs                          | Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action ( <i>number of NOVs meeting criteria</i> )                                                                            | 3      | 15%     |
|                               | Other written NOVs                                                                                                                                                                                                                     | 0      | 0%      |
| Orders                        | Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )                                                                                                                      | 0      | 0%      |
|                               | Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission | 0      | 0%      |
| Judgments and Consent Decrees | Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )                               | 0      | 0%      |
|                               | Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government                                        | 0      | 0%      |
| Convictions                   | Any criminal convictions of this state or the federal government ( <i>number of counts</i> )                                                                                                                                           | 0      | 0%      |
| Emissions                     | Chronic excessive emissions events ( <i>number of events</i> )                                                                                                                                                                         | 0      | 0%      |
| Audits                        | Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which notices were submitted</i> )     | 0      | 0%      |
|                               | Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )                                                | 0      | 0%      |
| Other                         | Environmental management systems in place for one year or more                                                                                                                                                                         | No     | 0%      |
|                               | Voluntary on-site compliance assessments conducted by the executive director under a special assistance program                                                                                                                        | No     | 0%      |
|                               | Participation in a voluntary pollution reduction program                                                                                                                                                                               | No     | 0%      |
|                               | Early compliance with, or offer of a product that meets future state or federal government environmental requirements                                                                                                                  | No     | 0%      |

**Adjustment Percentage (Subtotal 2)** 15%

### >> Repeat Violator (Subtotal 3)

No

**Adjustment Percentage (Subtotal 3)** 0%

### >> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

**Adjustment Percentage (Subtotal 7)** 0%

### >> Compliance History Summary

**Compliance History Notes**

Enhancement for three months of self-reported effluent violations

**Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)** 15%

### >> Final Compliance History Adjustment

**Final Adjustment Percentage \*capped at 100%** 15%

|                                                                                                                                                                                                                      |                                   |                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------|
| <b>Screening Date</b> 22-Jun-2023<br><b>Respondent</b> City of Savoy<br><b>Case ID No.</b> 64216<br><b>Reg. Ent. Reference No.</b> RN102921988<br><b>Media</b> Water Quality<br><b>Enf. Coordinator</b> Kolby Farren | <b>Docket No.</b> 2023-0813-MWD-E | <b>PCW</b><br><i>Policy Revision 5 (January 28, 2021)</i><br><i>PCW Revision February 11, 2021</i> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------|

  

|                              |                                                                                                                                                                                                                            |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Violation Number</b>      | 1                                                                                                                                                                                                                          |
| <b>Rule Cite(s)</b>          | 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0014273001, Interim Phase Effluent Limitations and Monitoring Requirements No. 1 |
| <b>Violation Description</b> | Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.                                                                                                                   |

  

|                     |          |
|---------------------|----------|
| <b>Base Penalty</b> | \$25,000 |
|---------------------|----------|

  

**>> Environmental, Property and Human Health Matrix**

|           |           |                |             |       |                      |
|-----------|-----------|----------------|-------------|-------|----------------------|
| <b>OR</b> |           | <b>Release</b> | <b>Harm</b> |       |                      |
|           |           | Major          | Moderate    | Minor |                      |
|           | Actual    | X              |             |       |                      |
|           | Potential |                |             |       | <b>Percent</b> 50.0% |

  

**>> Programmatic Matrix**

|  |               |       |          |       |                     |
|--|---------------|-------|----------|-------|---------------------|
|  | Falsification | Major | Moderate | Minor |                     |
|  |               |       |          |       | <b>Percent</b> 0.0% |

  

|              |                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Matrix Notes | A simplified model was used to evaluate carbonaceous biochemical oxygen demand (5-day) and total ammonia nitrogen demand to determine whether the discharged amounts of pollutants exceeded protective levels. Human health or the environment has been exposed to pollutants that exceed levels that are protective of human health or environmental receptors as a result of the violation. |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

  

|                   |          |
|-------------------|----------|
| <b>Adjustment</b> | \$12,500 |
|-------------------|----------|

  

|                   |          |
|-------------------|----------|
| <b>Adjustment</b> | \$12,500 |
|-------------------|----------|

  

**Violation Events**

|                            |   |  |    |                          |
|----------------------------|---|--|----|--------------------------|
| Number of Violation Events | 1 |  | 31 | Number of violation days |
|----------------------------|---|--|----|--------------------------|

  

|  |              |  |   |  |  |
|--|--------------|--|---|--|--|
|  | daily        |  |   |  |  |
|  | weekly       |  |   |  |  |
|  | monthly      |  | X |  |  |
|  | quarterly    |  |   |  |  |
|  | semiannual   |  |   |  |  |
|  | annual       |  |   |  |  |
|  | single event |  |   |  |  |

  

|                               |          |
|-------------------------------|----------|
| <b>Violation Base Penalty</b> | \$12,500 |
|-------------------------------|----------|

  

|                           |          |
|---------------------------|----------|
| <b>Violation Subtotal</b> | \$12,500 |
|---------------------------|----------|

  

**Good Faith Efforts to Comply**

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|                           |          |
|---------------------------|----------|
| <b>Violation Subtotal</b> | \$12,500 |
|---------------------------|----------|

  

**Economic Benefit (EB) for this violation**

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|                           |          |
|---------------------------|----------|
| <b>Violation Subtotal</b> | \$12,500 |
|---------------------------|----------|

  

**Economic Benefit (EB) for this violation**

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                                                                          |                                   |
|---------------|--------------------------------------------------------------------------|-----------------------------------|
|               | 0.0%                                                                     |                                   |
|               | Before NOE/NOV                                                           | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                                                                          |                                   |
| Ordinary      |                                                                          |                                   |
| N/A           | X                                                                        |                                   |
| Notes         | The Respondent does not meet the good faith criteria for this violation. |                                   |

  

|               |                |                                   |
|---------------|----------------|-----------------------------------|
|               | 0.0%           |                                   |
|               | Before NOE/NOV | NOE/NOV to EDPRP/Settlement Offer |
| Extraordinary |                |                                   |
|               |                |                                   |

# Economic Benefit Worksheet

**Respondent** City of Savoy  
**Case ID No.** 64216  
**Reg. Ent. Reference No.** RN102921988  
**Media** Water Quality  
**Violation No.** 1

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

| Item Description | Item Cost | Date Required | Final Date | Yrs | Interest Saved | Costs Saved | EB Amount |
|------------------|-----------|---------------|------------|-----|----------------|-------------|-----------|
|------------------|-----------|---------------|------------|-----|----------------|-------------|-----------|

## Delayed Costs

|                          |         |             |            |      |       |     |       |
|--------------------------|---------|-------------|------------|------|-------|-----|-------|
| Equipment                |         |             |            | 0.00 | \$0   | \$0 | \$0   |
| Buildings                |         |             |            | 0.00 | \$0   | \$0 | \$0   |
| Other (as needed)        |         |             |            | 0.00 | \$0   | \$0 | \$0   |
| Engineering/Construction |         |             |            | 0.00 | \$0   | \$0 | \$0   |
| Land                     |         |             |            | 0.00 | \$0   | n/a | \$0   |
| Record Keeping System    |         |             |            | 0.00 | \$0   | n/a | \$0   |
| Training/Sampling        |         |             |            | 0.00 | \$0   | n/a | \$0   |
| Remediation/Disposal     |         |             |            | 0.00 | \$0   | n/a | \$0   |
| Permit Costs             |         |             |            | 0.00 | \$0   | n/a | \$0   |
| Other (as needed)        | \$5,000 | 31-Dec-2022 | 5-Apr-2026 | 3.26 | \$816 | n/a | \$816 |

### Notes for DELAYED costs

Estimated cost to determine the cause of noncompliance and make any necessary repairs/adjustments to the Facility to return to compliance with the permitted effluent limitations. Date required is the end date of the first month of noncompliance, and the final date is the estimated date of compliance.

## Avoided Costs

### ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |

### Notes for AVOIDED costs

Approx. Cost of Compliance

\$5,000

**TOTAL**

\$816

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------|--------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------|
| <b>Screening Date</b> 22-Jun-2023<br><b>Respondent</b> City of Savoy<br><b>Case ID No.</b> 64216<br><b>Reg. Ent. Reference No.</b> RN102921988<br><b>Media</b> Water Quality<br><b>Enf. Coordinator</b> Kolby Farren                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Docket No.</b> 2023-0813-MWD-E<br><br><b>PCW</b><br><i>Policy Revision 5 (January 28, 2021)</i><br><i>PCW Revision February 11, 2021</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Violation Number</b> <span style="border: 1px solid black; padding: 2px;">2</span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Rule Cite(s)</b> <span style="border: 1px solid black; padding: 5px;">30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0014273001, Interim Phase Effluent Limitations and Monitoring Requirements No. 1</span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Violation Description</b> <span style="border: 1px solid black; padding: 5px;">Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.</span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Base Penalty</b> <span style="border: 1px solid black; padding: 2px;">\$25,000</span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>&gt;&gt; Environmental, Property and Human Health Matrix</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>OR</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;"></td> <td style="width: 20%; text-align: center;"><b>Release</b></td> <td style="width: 20%; text-align: center;"><b>Harm</b></td> <td style="width: 20%;"></td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">Major      Moderate      Minor</td> <td></td> </tr> <tr> <td style="text-align: center;">Actual</td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> <td style="text-align: center;">x</td> </tr> <tr> <td style="text-align: center;">Potential</td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> </tr> </table> <div style="display: flex; justify-content: flex-end; margin-top: 5px;"> <b>Percent</b> <span style="border: 1px solid black; padding: 2px;">15.0%</span> </div> |                                                              | <b>Release</b>                                               | <b>Harm</b>                                                  |                                                              |                                                              |                                                              | Major      Moderate      Minor                               |                                                              | Actual                                                       | <span style="border: 1px solid black; padding: 2px;"></span> | <span style="border: 1px solid black; padding: 2px;"></span> | x                                                            | Potential    | <span style="border: 1px solid black; padding: 2px;"></span> | <span style="border: 1px solid black; padding: 2px;"></span> | <span style="border: 1px solid black; padding: 2px;"></span> |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Release</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Harm</b>                                                  |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Major      Moderate      Minor                               |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| Actual                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <span style="border: 1px solid black; padding: 2px;"></span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <span style="border: 1px solid black; padding: 2px;"></span> | x                                                            |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| Potential                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <span style="border: 1px solid black; padding: 2px;"></span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <span style="border: 1px solid black; padding: 2px;"></span> | <span style="border: 1px solid black; padding: 2px;"></span> |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>&gt;&gt; Programmatic Matrix</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;"></td> <td style="width: 20%; text-align: center;">Falsification</td> <td style="width: 20%; text-align: center;">Major</td> <td style="width: 20%; text-align: center;">Moderate</td> <td style="width: 20%; text-align: center;">Minor</td> </tr> <tr> <td></td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> </tr> </table> <div style="display: flex; justify-content: flex-end; margin-top: 5px;"> <b>Percent</b> <span style="border: 1px solid black; padding: 2px;">0.0%</span> </div>                                                                                                                                                                                                                                            |                                                              | Falsification                                                | Major                                                        | Moderate                                                     | Minor                                                        |                                                              | <span style="border: 1px solid black; padding: 2px;"></span> | <span style="border: 1px solid black; padding: 2px;"></span> | <span style="border: 1px solid black; padding: 2px;"></span> | <span style="border: 1px solid black; padding: 2px;"></span> |                                                              |                                                              |              |                                                              |                                                              |                                                              |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <span style="border: 1px solid black; padding: 2px;"></span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <span style="border: 1px solid black; padding: 2px;"></span> | <span style="border: 1px solid black; padding: 2px;"></span> | <span style="border: 1px solid black; padding: 2px;"></span> |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Matrix Notes</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <div style="border: 1px solid black; padding: 5px; margin-top: 10px;">         A simplified model was used to evaluate biochemical oxygen demand (5-day) and total ammonia nitrogen demand to determine whether the discharged amounts of pollutants exceeded protective levels. Total suspended solids was also considered. Human health or the environment has been exposed to an insignificant amount of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.       </div>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Adjustment</b> <span style="border: 1px solid black; padding: 2px;">\$21,250</span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <span style="border: 1px solid black; padding: 2px;">\$3,750</span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Violation Events</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div> <b>Number of Violation Events</b> <span style="border: 1px solid black; padding: 2px;">2</span> </div> <div> <span style="border: 1px solid black; padding: 2px;">89</span> <b>Number of violation days</b> </div> </div> <div style="margin-top: 10px;"> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 20%;">daily</td><td><span style="border: 1px solid black; padding: 2px;"></span></td></tr> <tr><td>weekly</td><td><span style="border: 1px solid black; padding: 2px;"></span></td></tr> <tr><td>monthly</td><td><span style="border: 1px solid black; padding: 2px;"></span></td></tr> <tr><td>quarterly</td><td style="text-align: center;">X</td></tr> <tr><td>semiannual</td><td><span style="border: 1px solid black; padding: 2px;"></span></td></tr> <tr><td>annual</td><td><span style="border: 1px solid black; padding: 2px;"></span></td></tr> <tr><td>single event</td><td><span style="border: 1px solid black; padding: 2px;"></span></td></tr> </table> </div> <div style="display: flex; justify-content: flex-end; margin-top: 10px;"> <b>Violation Base Penalty</b> <span style="border: 1px solid black; padding: 2px;">\$7,500</span> </div> <div style="margin-top: 10px; border: 1px solid black; padding: 5px;">         Two quarterly events are recommended for the quarters containing the months of February 2022, April 2022, and January 2023.       </div> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | daily                                                        | <span style="border: 1px solid black; padding: 2px;"></span> | weekly                                                       | <span style="border: 1px solid black; padding: 2px;"></span> | monthly                                                      | <span style="border: 1px solid black; padding: 2px;"></span> | quarterly                                                    | X                                                            | semiannual                                                   | <span style="border: 1px solid black; padding: 2px;"></span> | annual                                                       | <span style="border: 1px solid black; padding: 2px;"></span> | single event | <span style="border: 1px solid black; padding: 2px;"></span> |                                                              |                                                              |
| daily                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <span style="border: 1px solid black; padding: 2px;"></span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| weekly                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <span style="border: 1px solid black; padding: 2px;"></span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| monthly                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <span style="border: 1px solid black; padding: 2px;"></span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| quarterly                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | X                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| semiannual                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <span style="border: 1px solid black; padding: 2px;"></span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| annual                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <span style="border: 1px solid black; padding: 2px;"></span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| single event                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <span style="border: 1px solid black; padding: 2px;"></span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Good Faith Efforts to Comply</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div> <b>0.0%</b><br/>         Before NOE/NOV    NOE/NOV to EDPRP/Settlement Offer       </div> <div> <b>Reduction</b> <span style="border: 1px solid black; padding: 2px;">\$0</span> </div> </div> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <tr> <td style="width: 20%;">Extraordinary</td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> </tr> <tr> <td>Ordinary</td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> </tr> <tr> <td>N/A</td> <td style="text-align: center;">X</td> <td><span style="border: 1px solid black; padding: 2px;"></span></td> </tr> </table> <div style="margin-top: 10px;"> <b>Notes</b> <span style="border: 1px solid black; padding: 5px; display: inline-block; width: 80%;">The Respondent does not meet the good faith criteria for this violation.</span> </div>                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Extraordinary                                                | <span style="border: 1px solid black; padding: 2px;"></span> | <span style="border: 1px solid black; padding: 2px;"></span> | Ordinary                                                     | <span style="border: 1px solid black; padding: 2px;"></span> | <span style="border: 1px solid black; padding: 2px;"></span> | N/A                                                          | X                                                            | <span style="border: 1px solid black; padding: 2px;"></span> |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| Extraordinary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <span style="border: 1px solid black; padding: 2px;"></span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <span style="border: 1px solid black; padding: 2px;"></span> |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| Ordinary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <span style="border: 1px solid black; padding: 2px;"></span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <span style="border: 1px solid black; padding: 2px;"></span> |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | X                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <span style="border: 1px solid black; padding: 2px;"></span> |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Violation Subtotal</b> <span style="border: 1px solid black; padding: 2px;">\$7,500</span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Economic Benefit (EB) for this violation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Statutory Limit Test</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>Estimated EB Amount</b> <span style="border: 1px solid black; padding: 2px;">\$0</span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Violation Final Penalty Total</b> <span style="border: 1px solid black; padding: 2px;">\$8,625</span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |
| <b>This violation Final Assessed Penalty (adjusted for limits)</b> <span style="border: 1px solid black; padding: 2px;">\$8,625</span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |                                                              |              |                                                              |                                                              |                                                              |

# Economic Benefit Worksheet

**Respondent** City of Savoy  
**Case ID No.** 64216  
**Reg. Ent. Reference No.** RN102921988  
**Media** Water Quality  
**Violation No.** 2

| Percent Interest | Years of Depreciation |
|------------------|-----------------------|
| 5.0              | 15                    |

| Item Description | Item Cost | Date Required | Final Date | Yrs | Interest Saved | Costs Saved | EB Amount |
|------------------|-----------|---------------|------------|-----|----------------|-------------|-----------|
|------------------|-----------|---------------|------------|-----|----------------|-------------|-----------|

## Delayed Costs

|                          |  |  |  |      |     |     |     |
|--------------------------|--|--|--|------|-----|-----|-----|
| Equipment                |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Buildings                |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Engineering/Construction |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Land                     |  |  |  | 0.00 | \$0 | n/a | \$0 |
| Record Keeping System    |  |  |  | 0.00 | \$0 | n/a | \$0 |
| Training/Sampling        |  |  |  | 0.00 | \$0 | n/a | \$0 |
| Remediation/Disposal     |  |  |  | 0.00 | \$0 | n/a | \$0 |
| Permit Costs             |  |  |  | 0.00 | \$0 | n/a | \$0 |
| Other (as needed)        |  |  |  | 0.00 | \$0 | n/a | \$0 |

Notes for DELAYED costs

See Economic Benefit Worksheet for Violation No. 1.

## Avoided Costs

### ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

|                               |  |  |  |      |     |     |     |
|-------------------------------|--|--|--|------|-----|-----|-----|
| Disposal                      |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Personnel                     |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Supplies/Equipment            |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance           |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs        |  |  |  | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed)             |  |  |  | 0.00 | \$0 | \$0 | \$0 |

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

**TOTAL**

\$0

| City of Savoy<br>TPDES Permit No. WQ0014273001<br>Docket No. 2023-0813-MWD-E<br>Case No. 64216 |                                                         |                                                           |                                                              |                                                      |                                                         |                                                |
|------------------------------------------------------------------------------------------------|---------------------------------------------------------|-----------------------------------------------------------|--------------------------------------------------------------|------------------------------------------------------|---------------------------------------------------------|------------------------------------------------|
| Effluent Violation Table                                                                       |                                                         |                                                           |                                                              |                                                      |                                                         |                                                |
| Monitoring period                                                                              | Ammonia Nitrogen<br><br>Daily Avg. Conc. Limit = 3 mg/L | Ammonia Nitrogen<br><br>Single Grab Conc. Limit = 15 mg/L | Ammonia Nitrogen<br><br>Daily Avg. Load. Limit = 3.2 lbs/day | CBOD (5-day)<br><br>Daily Avg. Conc. Limit = 10 mg/L | CBOD (5-day)<br><br>Daily Avg. Load. Limit = 11 lbs/day | TSS<br><br>Daily Avg. Load. Limit = 16 lbs/day |
| February 2022                                                                                  | c                                                       | c                                                         | c                                                            | c                                                    | 13.13                                                   | 20.23                                          |
| April 2022                                                                                     | 5.27                                                    | c                                                         | 5.27                                                         | c                                                    | c                                                       | c                                              |
| December 2022                                                                                  | 12.78                                                   | 19.2                                                      | 10.7                                                         | 11.13                                                | c                                                       | c                                              |
| January 2023                                                                                   | 4.84                                                    | 16.8                                                      | c                                                            | c                                                    | c                                                       | c                                              |

Avg. = Average    mg/L = milligrams per liter    lbs/day = pounds per day    c = compliant  
CBOD = Carbonaceous Biochemical Oxygen Demand (5-day)    Conc. = Concentration  
Load. = loading    TSS = total suspended solids



# Compliance History Report

Compliance History Report for CN600678122, RN102921988, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

**Customer, Respondent, or Owner/Operator:** CN600678122, City of Savoy

**Classification:** SATISFACTORY

**Rating:** 0.67

**Regulated Entity:** RN102921988, SAVOY WWTP

**Classification:** SATISFACTORY

**Rating:** 0.67

**Complexity Points:** 8

**Repeat Violator:** NO

**CH Group:** 08 - Sewage Treatment Facilities

**Location:** 601 North Cedar Street, in the City of Savoy, Fannin County, Texas 75479

**TCEQ Region:** REGION 04 - DFW METROPLEX

**ID Number(s):**

**WASTEWATER PERMIT** WQ0014273001

**WASTEWATER EPA ID** TX0023299

**SLUDGE AUTHORIZATION** 720024

**Compliance History Period:** September 01, 2019 to August 31, 2024

**Rating Year:** 2024

**Rating Date:** 09/01/2024

**Date Compliance History Report Prepared:** July 24, 2025

**Agency Decision Requiring Compliance History:** Enforcement

**Component Period Selected:** July 24, 2020 to July 24, 2025

**TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.**

**Name:** Kolby Farren

**Phone:** (512) 239-2098

**Site and Owner/Operator History:**

- 1) Has the site been in existence and/or operation for the full five year compliance period?

YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period?

NO

**Components (Multimedia) for the Site Are Listed in Sections A - J**

**A. Final Orders, court judgments, and consent decrees:**

N/A

**B. Criminal convictions:**

N/A

**C. Chronic excessive emissions events:**

N/A

**D. The approval dates of investigations (CCEDS Inv. Track. No.):**

|         |                    |           |         |                    |           |
|---------|--------------------|-----------|---------|--------------------|-----------|
| Item 1  | January 20, 2021   | (1713044) | Item 14 | September 19, 2022 | (1856416) |
| Item 2  | February 20, 2021  | (1726101) | Item 15 | October 20, 2022   | (1862773) |
| Item 3  | August 19, 2021    | (1757359) | Item 16 | November 17, 2022  | (1869686) |
| Item 4  | September 17, 2021 | (1766454) | Item 17 | December 20, 2022  | (1875536) |
| Item 5  | October 19, 2021   | (1777028) | Item 18 | May 16, 2023       | (1912702) |
| Item 6  | November 09, 2021  | (1783818) | Item 19 | June 20, 2023      | (1919306) |
| Item 7  | January 10, 2022   | (1798638) | Item 20 | July 20, 2023      | (1926272) |
| Item 8  | February 03, 2022  | (1789003) | Item 21 | August 18, 2023    | (1933231) |
| Item 9  | February 16, 2022  | (1806512) | Item 22 | September 19, 2023 | (1939372) |
| Item 10 | April 19, 2022     | (1820149) | Item 23 | October 19, 2023   | (1946220) |
| Item 11 | June 17, 2022      | (1835282) | Item 24 | November 17, 2023  | (1951911) |
| Item 12 | July 13, 2022      | (1842484) | Item 25 | December 20, 2023  | (1961676) |
| Item 13 | August 17, 2022    | (1848616) | Item 26 | February 15, 2024  | (1977332) |

|         |                    |           |         |                   |           |
|---------|--------------------|-----------|---------|-------------------|-----------|
| Item 27 | March 20, 2024     | (1983899) | Item 34 | October 18, 2024  | (2030134) |
| Item 28 | April 19, 2024     | (1990428) | Item 35 | November 19, 2024 | (2036452) |
| Item 29 | May 20, 2024       | (1996885) | Item 36 | December 18, 2024 | (2042807) |
| Item 31 | July 19, 2024      | (2011395) | Item 37 | March 19, 2025    | (2065528) |
| Item 32 | August 20, 2024    | (2016992) | Item 38 | May 19, 2025      | (2078730) |
| Item 33 | September 19, 2024 | (2024013) |         |                   |           |

**E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):**

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

- |   |                                                                                                                                                                                                                                 |                          |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| 1 | Date: 12/31/2024 (2049394)<br>Self Report? YES<br>Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)<br>Description: Failure to meet the limit for one or more permit parameter | Classification: Moderate |
| 2 | Date: 01/31/2025 (2056961)<br>Self Report? YES<br>Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)<br>Description: Failure to meet the limit for one or more permit parameter | Classification: Moderate |
| 3 | Date: 03/31/2025 (2072332)<br>Self Report? YES<br>Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)<br>Description: Failure to meet the limit for one or more permit parameter | Classification: Moderate |

**F. Environmental audits:**

N/A

**G. Type of environmental management systems (EMSs):**

N/A

**H. Voluntary on-site compliance assessment dates:**

N/A

**I. Participation in a voluntary pollution reduction program:**

N/A

**J. Early compliance:**

N/A

**Sites Outside of Texas:**

N/A

## **Component Appendices**

### **Appendix A**

#### **All NOVs Issued During Component Period 7/24/2020 and 7/24/2025**

|   |                                                                                                                                                                                                                                                             |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Date: 07/31/2020 (1680538)<br>Self Report? YES<br>Classification: Moderate<br>Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)<br>Description: Failure to meet the limit for one or more permit parameter |
| 2 | Date: 08/31/2020 (1687105)<br>Self Report? YES<br>Classification: Moderate<br>Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)<br>Description: Failure to meet the limit for one or more permit parameter |
| 3 | Date: 09/30/2020 (1693449)<br>Self Report? YES<br>Classification: Moderate<br>Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)<br>Description: Failure to meet the limit for one or more permit parameter |
| 4 | Date: 10/31/2020 (1713042)<br>Self Report? YES<br>Classification: Moderate<br>Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)<br>Description: Failure to meet the limit for one or more permit parameter |
| 5 | Date: 11/30/2020 (1713043)<br>Self Report? YES<br>Classification: Moderate<br>Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)<br>Description: Failure to meet the limit for one or more permit parameter |
| 6 | Date: 02/28/2021 (1726102)<br>Self Report? YES<br>Classification: Moderate<br>Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)<br>Description: Failure to meet the limit for one or more permit parameter |
| 7 | Date: 03/31/2021 (1726103)<br>Self Report? YES<br>Classification: Moderate<br>Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)<br>Description: Failure to meet the limit for one or more permit parameter |
| 8 | Date: 04/30/2021 (1740355)<br>Self Report? YES<br>Classification: Moderate<br>Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)                                                                                                                           |

- |    |                                                                                                                                               |                 |          |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------|
| 9  | Date: 05/31/2021 (1747685)                                                                                                                    |                 |          |
|    | Self Report? YES                                                                                                                              | Classification: | Moderate |
|    | Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)                                            |                 |          |
|    | Description: Failure to meet the limit for one or more permit parameter                                                                       |                 |          |
| 10 | Date: 06/30/2021 (1751898)                                                                                                                    |                 |          |
|    | Self Report? YES                                                                                                                              | Classification: | Moderate |
|    | Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)                                            |                 |          |
|    | Description: Failure to meet the limit for one or more permit parameter                                                                       |                 |          |
| 11 | Date: 11/30/2021 (1790847)                                                                                                                    |                 |          |
|    | Self Report? YES                                                                                                                              | Classification: | Moderate |
|    | Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1)                                            |                 |          |
|    | Description: Failure to meet the limit for one or more permit parameter                                                                       |                 |          |
| 12 | Date: 12/13/2021 (1773788)                                                                                                                    |                 |          |
|    | Self Report? NO                                                                                                                               | Classification: | Minor    |
|    | Citation: 30 TAC Chapter 217, SubChapter M 217.330(c)<br>TX0023299 PERMIT<br>WQ0014273001 PERMIT                                              |                 |          |
|    | Description: Failure to maintain annual certifications for the backflow prevent device.                                                       |                 |          |
|    | Self Report? NO                                                                                                                               | Classification: | Minor    |
|    | Citation: 30 TAC Chapter 305, SubChapter F 305.125(5)<br>TX0023299 PERMIT<br>WQ0014273001 PERMIT                                              |                 |          |
|    | Description: Failed to properly operate and maintain the lift station.                                                                        |                 |          |
|    | Self Report? NO                                                                                                                               | Classification: | Moderate |
|    | Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)<br>Sludge Provisions, Section III(G) PERMIT                                             |                 |          |
|    | Description: Failed to submit the annual sludge report.                                                                                       |                 |          |
|    | Self Report? NO                                                                                                                               | Classification: | Minor    |
|    | Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)<br>Monitoring and Reporting Requirements, PERMIT                                        |                 |          |
|    | Description: Failed to calibrate the flow meter at least annually to ensure accuracy.                                                         |                 |          |
|    | Self Report? NO                                                                                                                               | Classification: | Minor    |
|    | Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)<br>Monitoring and Reporting Requirements, PERMIT                                        |                 |          |
|    | Description: Failed to provide notification of any effluent violation which deviates from the permitted effluent limitation by more than 40%. |                 |          |
|    | Self Report? NO                                                                                                                               | Classification: | Moderate |
|    | Citation: 30 TAC Chapter 217, SubChapter E 217.123(b)<br>TX0023299 PERMIT<br>WQ0014273001 PERMIT                                              |                 |          |
|    | Description: Failed to properly store the bar screen screenings.                                                                              |                 |          |
|    | Self Report? NO                                                                                                                               | Classification: | Moderate |
|    | Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)                                                                                         |                 |          |

Other Requirements No. 9 PERMIT

Description: Failed to notify the TCEQ of planned physical alterations or additions to the facility.

Self Report? NO Classification: Minor

Citation:  
30 TAC Chapter 305, SubChapter F 305.125(1)  
30 TAC Chapter 319, SubChapter A 319.7(a)  
Monitoring and Reporting Requirements PERMIT

Description: Failure to maintain complete monitoring and reporting records at the facility.

13 Date: 02/28/2022 (1813580)

Self Report? YES Classification: Moderate

Citation:  
2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

14 Date: 04/30/2022 (1828989)

Self Report? YES Classification: Moderate

Citation:  
2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

15 Date: 12/31/2022 (1882356)

Self Report? YES Classification: Moderate

Citation:  
2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

16 Date: 01/31/2023 (1890170)

Self Report? YES Classification: Moderate

Citation:  
2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

17 Date: 02/28/2023 (1898733)

Self Report? YES Classification: Moderate

Citation:  
2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

18 Date: 03/31/2023 (1905520)

Self Report? YES Classification: Moderate

Citation:  
2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

19\* Date: 12/31/2023 (1968271)

Self Report? YES Classification: Moderate

Citation:  
2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

|     |                                                                                                    |                          |  |
|-----|----------------------------------------------------------------------------------------------------|--------------------------|--|
| 20* | Date: 05/31/2024 (2003837)                                                                         |                          |  |
|     | Self Report? YES                                                                                   | Classification: Moderate |  |
|     | Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1) |                          |  |
|     | Description: Failure to meet the limit for one or more permit parameter                            |                          |  |
| 21  | Date: 12/31/2024 (2049394)                                                                         |                          |  |
|     | Self Report? YES                                                                                   | Classification: Moderate |  |
|     | Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1) |                          |  |
|     | Description: Failure to meet the limit for one or more permit parameter                            |                          |  |
| 22  | Date: 01/31/2025 (2056961)                                                                         |                          |  |
|     | Self Report? YES                                                                                   | Classification: Moderate |  |
|     | Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1) |                          |  |
|     | Description: Failure to meet the limit for one or more permit parameter                            |                          |  |
| 23  | Date: 03/31/2025 (2072332)                                                                         |                          |  |
|     | Self Report? YES                                                                                   | Classification: Moderate |  |
|     | Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)<br>30 TAC Chapter 305, SubChapter F 305.125(1) |                          |  |
|     | Description: Failure to meet the limit for one or more permit parameter                            |                          |  |

\* NOV's applicable for the Compliance History rating period 9/1/2019 to 8/31/2024

## Appendix B

### All Investigations Conducted During Component Period July 24, 2020 and July 24, 2025

|          |                      |           |
|----------|----------------------|-----------|
| Item 1   | August 20, 2020**    | (1680538) |
| Item 2   | September 18, 2020** | (1687105) |
| Item 3   | October 20, 2020**   | (1693449) |
| Item 4   | November 09, 2020**  | (1713042) |
| Item 5   | December 14, 2020**  | (1713043) |
| Item 6*  | January 20, 2021**   | (1713044) |
| Item 7*  | February 20, 2021**  | (1726101) |
| Item 8   | March 19, 2021**     | (1726102) |
| Item 9   | April 19, 2021**     | (1726103) |
| Item 10  | May 17, 2021**       | (1740355) |
| Item 11  | June 18, 2021**      | (1747685) |
| Item 12  | July 16, 2021**      | (1751898) |
| Item 13* | August 19, 2021**    | (1757359) |
| Item 14* | September 17, 2021** | (1766454) |
| Item 15* | October 19, 2021**   | (1777028) |
| Item 16* | November 09, 2021**  | (1783818) |
| Item 17  | December 09, 2021**  | (1773788) |
| Item 18  | December 16, 2021**  | (1790847) |
| Item 19* | January 10, 2022**   | (1798638) |
| Item 20  | January 11, 2022**   | (1783089) |

|          |                      |           |
|----------|----------------------|-----------|
| Item 21* | February 03, 2022**  | (1789003) |
| Item 22* | February 16, 2022**  | (1806512) |
| Item 23  | March 18, 2022**     | (1813580) |
| Item 24* | April 19, 2022**     | (1820149) |
| Item 25  | May 19, 2022**       | (1828989) |
| Item 26* | June 17, 2022**      | (1835282) |
| Item 27* | July 13, 2022**      | (1842484) |
| Item 28* | August 17, 2022**    | (1848616) |
| Item 29* | September 19, 2022** | (1856416) |
| Item 30* | October 20, 2022**   | (1862773) |
| Item 31* | November 17, 2022**  | (1869686) |
| Item 32* | December 20, 2022**  | (1875536) |
| Item 33  | January 19, 2023**   | (1882356) |
| Item 34  | February 16, 2023**  | (1890170) |
| Item 35  | March 16, 2023**     | (1898733) |
| Item 36  | April 20, 2023**     | (1905520) |
| Item 37* | May 16, 2023**       | (1912702) |
| Item 38  | June 05, 2023**      | (1896595) |
| Item 39* | June 20, 2023**      | (1919306) |
| Item 40* | July 20, 2023**      | (1926272) |
| Item 41* | August 18, 2023**    | (1933231) |
| Item 42* | September 19, 2023** | (1939372) |
| Item 43* | October 19, 2023**   | (1946220) |
| Item 44* | November 17, 2023**  | (1951911) |
|          |                      |           |
| Item 45* | December 20, 2023**  | (1961676) |
| Item 46  | January 16, 2024**   | (1968271) |
| Item 47* | February 15, 2024**  | (1977332) |
| Item 48* | March 20, 2024**     | (1983899) |
| Item 49* | April 19, 2024**     | (1990428) |
| Item 50* | May 20, 2024**       | (1996885) |
| Item 51  | June 18, 2024**      | (2003837) |
| Item 52* | July 19, 2024**      | (2011395) |
| Item 53* | August 20, 2024**    | (2016992) |
| Item 54* | September 19, 2024   | (2024013) |
| Item 55* | October 18, 2024     | (2030134) |
| Item 56* | November 19, 2024    | (2036452) |
| Item 57* | December 18, 2024    | (2042807) |
| Item 58  | January 17, 2025     | (2049394) |
| Item 59  | February 19, 2025    | (2056961) |
| Item 60* | March 19, 2025       | (2065528) |
| Item 61  | April 15, 2025       | (2072332) |
| Item 62* | May 19, 2025         | (2078730) |

\* No violations documented during this investigation

\*\*Investigation applicable for the Compliance History Rating period between 09/01/2019 and 08/31/2024.

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
CITY OF SAVOY  
RN102921988

§ BEFORE THE  
§  
§ TEXAS COMMISSION ON  
§  
§ ENVIRONMENTAL QUALITY

## AGREED ORDER DOCKET NO. 2023-0813-MWD-E

On \_\_\_\_\_, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding the City of Savoy (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent, presented this Order to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

### I. FINDINGS OF FACT

1. The Respondent owns and operates a wastewater treatment facility located at 601 North Cedar Street in Savoy, Fannin County, Texas.
2. During a record review conducted on April 27, 2023, an investigator documented that the Respondent did not comply with permitted effluent limitations, as shown in the effluent violation table below:

| Effluent Violation Table |                                 |                                   |                                      |                                  |                                     |                                     |
|--------------------------|---------------------------------|-----------------------------------|--------------------------------------|----------------------------------|-------------------------------------|-------------------------------------|
| Monitoring period        | Ammonia Nitrogen                | Ammonia Nitrogen                  | Ammonia Nitrogen                     | CBOD (5-day)                     | CBOD (5-day)                        | TSS                                 |
|                          | Daily Avg. Conc. Limit = 3 mg/L | Single Grab Conc. Limit = 15 mg/L | Daily Avg. Load. Limit = 3.2 lbs/day | Daily Avg. Conc. Limit = 10 mg/L | Daily Avg. Load. Limit = 11 lbs/day | Daily Avg. Load. Limit = 16 lbs/day |
| February 2022            | c                               | c                                 | c                                    | c                                | 13.13                               | 20.23                               |
| April 2022               | 5.27                            | c                                 | 5.27                                 | c                                | c                                   | c                                   |
| December 2022            | 12.78                           | 19.2                              | 10.7                                 | 11.13                            | c                                   | c                                   |
| January 2023             | 4.84                            | 16.8                              | c                                    | c                                | c                                   | c                                   |

Avg. = Average    mg/L = milligrams per liter    lbs/day = pounds per day    c = compliant  
CBOD = Carbonaceous Biochemical Oxygen Demand (5-day)    Conc. = Concentration  
Load. = loading    TSS = total suspended solids

## II. CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE ch. 26 and the rules of the TCEQ.
2. As evidenced by Finding of Fact No. 2, the Respondent failed to comply with permitted effluent limitations, in violation of 30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0014273001, Effluent Limitations and Monitoring Requirements No. 1.
3. Pursuant to TEX. WATER CODE § 7.051, the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
4. An administrative penalty in the amount of \$23,000 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Respondent paid the \$23,000 penalty.

### III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 4 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: City of Savoy, Docket No. 2023-0813-MWD-E" to:

Financial Administration Division, Revenue Operations Section  
Attention: Cashier's Office, MC 214  
Texas Commission on Environmental Quality  
P.O. Box 13088  
Austin, Texas 78711-3088

2. The Respondent shall, within 130 days after the effective date of this Order, submit written certification of compliance with the effluent limitations of TPDES Permit No. WQ0014273001, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations. The certification shall include detail supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with the permitted effluent limitations. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Enforcement Division, MC 149A  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

with a copy to:

Water Section Manager  
Dallas/Fort Worth Regional Office  
Texas Commission on Environmental Quality  
1977 Industrial Boulevard  
Abilene, Texas 79602-7833

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Facility operations referenced in this Order.
5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
7. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
8. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
9. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively,

the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

-----  
For the Commission

-----  
Date

*Krista Mello-Jurach*  
-----

11/10/2025  
-----

For the Executive Director

Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the OAG for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the OAG of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

*Melissa Rickman*  
-----  
Signature

*8/27/25*  
-----  
Date

*Melissa Rickman*  
-----  
Name (Printed or typed)  
Authorized Representative of  
City of Savoy

*City Secretary*  
-----  
Title

☐ If mailing address has changed, please check this box and provide the new address below:

**Instructions:** Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.